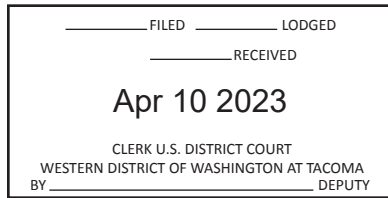


The Honorable Theresa L. Fricke



UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRYANT KEITH MCCULLOUGH,

Defendant.

NO. MJ23-5134

COMPLAINT FOR VIOLATIONS:  
18 U.S.C. § 2251(a), (e)

BEFORE, the Honorable Theresa L. Fricke, United States Magistrate Judge, U.S.  
Courthouse, Tacoma, Washington.

**COUNT 1**  
**(Production of Child Pornography)**

Between in or about 2021 and in or about 2023, in Pierce County, within the  
Western District of Washington, and elsewhere, BRYANT KEITH MCCULLOUGH,  
employed, used, persuaded, induced, enticed, and coerced a minor, to engage in sexually  
explicit conduct for the purpose of producing a visual depiction of such conduct and  
transmitting any live visual depiction of such conduct, and attempted to do so, knowing  
and having reason to know that such visual depiction would be transported and  
transmitted using any means or facility of interstate and foreign commerce, such visual  
depiction was transported and transmitted using any means or facility of interstate and  
foreign commerce and in and affecting interstate and foreign commerce, and such visual

1 depiction was produced using materials that had been mailed, shipped, and transported in  
2 interstate and foreign commerce.

3 All in violation of Title 18, United States Code, Section 2251(a), (e).

4 And the complainant states that this Complaint is based on the following  
5 information:

6 I, Special Agent Isabelle Ghini, being duly sworn under oath, depose and say:

7 **INTRODUCTION**

8 1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and  
9 have been since June 2021. I am currently assigned to the Seattle Division’s Tacoma  
10 Resident Agency. As an FBI Special Agent, I investigate criminal violations relating to  
11 child exploitation and child pornography, including violations pertaining to the illegal  
12 production, distribution, receipt and possession of child pornography, and material  
13 involving the sexual exploitation of minors in violation of 18 U.S.C. §§ 2251, 2252,  
14 2252A, 2422, and 2426. I have received specialized training from the FBI Academy  
15 consisting of legal classes, investigative techniques, evidence preservation and collection,  
16 financial related crimes, and other law enforcement training classes. Through my  
17 training and experience, I have developed an understanding of common habits and  
18 practices used by those engaged in criminal acts against children.

19 2. I am familiar with and have participated in a variety of investigative  
20 techniques including but not limited to surveillance, interviewing of witnesses/suspects,  
21 and the execution of search and seizure warrants that involved child exploitation and/or  
22 child pornography offenses, and the search and seizure of computers and other digital  
23 devices.

24 3. The facts set forth in this Complaint are based on my own personal  
25 knowledge; knowledge obtained from other individuals during my participation in this  
26 investigation, including other law enforcement officers; review of documents and records  
27 related to this investigation; communications with others who have personal knowledge  
28 of the events and circumstances described herein; and information gained through my

1 training and experience. I have not set forth all facts known to me as a result of this  
 2 investigation but only those facts I believe necessary to establish probable cause to  
 3 conclude that BRYANT KEITH MCCULLOUGH., committed the offense(s) charged in  
 4 this Complaint.

#### 5 SUMMARY OF THE INVESTIGATION

6 4. In or about February 2023, Tacoma Police Department (TPD) received  
 7 information from a private citizen who was concerned about an image shared in a group  
 8 chat comprising parents from the Pierce County, Washington, motocross community. The  
 9 image (described below) was sent among parents within the motocross community  
 10 because it appeared to have initially been sent by a youth motocross coach/sponsor,  
 11 BRYANT KEITH MCCULLOUGH, to a juvenile motocross racer sponsored by  
 12 MCCULLOUGH.

13 5. Task Force Officer (TFO) Jimmy Welsh contacted the juvenile (M1)  
 14 recipient of this photo from MCCULLOUGH. M1, currently 15 years old, explained that  
 15 he met MCCULLOUGH through the motocross community. M1 said he and  
 16 MCCULLOUGH communicated regularly through the social media/photo sharing  
 17 platform, Snapchat. Approximately one year ago, MCCULLOUGH sent M1a photo of  
 18 his face with the following text written over the image:

19 *"I'm gonna suck your dick and then when your [sic] the most hard I'm gonna*  
 20 *finish you off inside me. Then I'm gonna bend you over and finger your butt until*  
 21 *your [sic] nice and lose [sic] and then I'm gonna stick my big dick up your ass*  
 22 *until you can't take anymo [sic]."*

23 6. M1took a screenshot of this photo. And because Snapchat notifies a user  
 24 when an image or video they have shared is screenshotted/screen recorded by the  
 25 recipient, , MCCULLOUGH sent M1another photo of his face accompanied by the  
 26 following text:  
 27  
 28

1        *“Did u take a ss<sup>1</sup> of that shit or sum”*

2        7.        TFO Welsh was then contacted by another private citizen regarding her  
3 now 13-year-old son, M2. TFO Welsh spoke with M2, who told him that one night within  
4 the last six months, while staying the night at MCCULLOUGH’s apartment in Pierce  
5 County, M2 awoke to MCCULLOUGH touching his penis. In a subsequent child  
6 forensic interview, M2 confirmed that approximately 6-7 months ago while he was 12  
7 years old, he stayed the night at MCCULLOUGH’s residence for a motocross race  
8 weekend. M2 stated that at around 1AM he woke as he noticed his pants were being  
9 pulled down. His shorts were pulled down to approximately his mid-thigh. M2 said he  
10 then felt MCCULLOUGH’s “hands on [his] dick.” He said MCCULLOUGH picked up  
11 M2’s penis and was “rubbing his hands all over it.” M2 quickly sat up, and  
12 MCCULLOUGH then let go of M2’s penis and walked away.

13        8.        Review of investigative databases revealed a prior police report concerning  
14 allegations that MCCULLOUGH received and distributed a video of a then 14-year-old  
15 motocross racer, M3, having sexual intercourse with a minor female. The minor female  
16 reported that after receiving the video from M3, MCCULLOUGH shared the video  
17 through a group Snapchat with several others. M3, now 15 years old, confirmed to law  
18 enforcement that approximately one year ago he sent MCCULLOUGH, whom he knew  
19 through his motocross activities, a Snapchat video of himself having sexual intercourse  
20 with a then 16-year-old female. M3 reported that Snapchat notified him that  
21 MCCULLOUGH downloaded the video.

22        9.        On March 10, 2023, law enforcement executed a search warrant at  
23 MCCULLOUGH’s Pierce County apartment where he lived alone. During the search,  
24 police seized several digital devices used by MCCULLOUGH including a GoPro camera,  
25 laptop, multiple digital media storage devices, a cellphone, and film cameras. Forensic  
26 review of these devices is ongoing. The devices seized by law enforcement were found  
27  
28

<sup>1</sup> The term “ss” is commonly used shorthand to refer to “screenshot.” M1 provided both photos to TFO Welsh.

1 in the living room/office area of his apartment and in his bedroom. Multiple firearms  
 2 were present in MCCULLOUGH's apartment, however, police did not seize them as they  
 3 appeared to be lawfully possessed.

4 10. A forensic preview of MCCULLOUGH's GoPro revealed numerous  
 5 sexually explicit images videos of young males. Several of the videos show the camera  
 6 being used to film a cellphone on which the user opened and viewed images and videos  
 7 sent through the Snapchat application. Among these were the following:

8 Video 1 (2/17/21 at 9:56 AM): The video shows a Snapchat video being played  
 9 on a cellphone. The recording is approximately 34 seconds long. The cellphone  
 10 being filmed appears to be sitting on a desk for the entire video. Part of a computer  
 11 keyboard is visible next to the phone. There is a blue ID badge next to the  
 12 keyboard with a photo of MCCULLOUGH and the name "Bryant McCullough"  
 13 underneath the photo. The Snapchat video playing on the cellphone shows a white  
 14 male laying on his back while masturbating. The video continues until the male  
 15 ejaculates. While the Snapchat video is playing, an email notification comes  
 16 across the cellphone screen. The user accidentally opens the email while trying to  
 17 clear the notification. The email opens and is addressed to "Bryant." The user exits  
 18 the email application and reopens Snapchat. Upon reopening the Snapchat  
 19 application, the front facing camera was activated. MCCULLOUGH can clearly  
 20 be seen looking down at the cellphone and re-opening his Snapchat messages.

21 Video 2 (7/4/21 9:32 PM): The recording is focused on a cellphone displaying a  
 22 chat thread between the Snapchat user and M4. Based on the date stamp of the  
 23 recordings, M4 was approximately 14 years old at the time. In the captured chat  
 24 thread, M4 provides an email and password both of which include M4's name.  
 25 The Snapchat user then sends the following message: *"setup your phone and jerk*  
 26 *on camera mostly the hardest part and your cumshot. Butt content start a vid bend*  
 27 *over on your bed and open your cheeks – then make another in doggy style with*  
 28 *plenty of light and that's it – that's specific."* Numerous photos and videos are  
 then sent in the chat thread by M4. In subsequent videos, the recipient appears to  
 capture these photos and videos with the GoPro as they are opened from the  
 Snapchat chat thread on a cellphone.

11. The following 8 videos recorded with the GoPro on July 4, 2021, captured  
 images and videos sent by M4 (currently age 16). In an interview, M4 confirmed to  
 investigators that he sent over 50 sexually explicit images and videos to MCCULLOUGH  
 at MCCULLOUGH's request and with the promise that MCCULLOUGH would provide

1 him with money, motorcycle parts, clothing, alcohol, marijuana, and/or  
 2 assistance/preferential treatment regarding M4's motocross activity. M4 identified his  
 3 username on Snapchat and confirmed the below described interaction occurred between  
 4 himself and MCCULLOUGH:

5 **9:32 PM:** Captures a photo of white male wearing white underwear, showing  
 6 only male's upper thigh and buttocks.

7 **9:32 PM:** Captures photo of white male wearing white underwear using his hand  
 8 to hold his exposed and erect penis.

9 **9:33 PM:** Captures video of white male wearing white underwear pulling his  
 10 penis out of the underwear and briefly rubbing it.

11 **9:33 PM:** Captures photo of white male wearing white underwear bent over on  
 12 his hands and knees. The camera is behind the male focused on his upper thighs  
 13 and buttocks. The male's face is not visible. The male's penis is exposed.

14 **9:34 PM:** Captures photo of white male kneeling on bed wearing white  
 15 underwear holding his exposed penis

16 **9:34 PM:** Captures video of white male in same position as previous photo on the  
 17 same bed, masturbating. The male's face is visible during the video, and he has  
 18 been positively identified as M4.

19 **9:34 PM:** Captures video of white male in same position as previous video and  
 20 appears to be a continuation of the previous video showing the male masturbating.  
 21 The male's face is visible during the video, and he has been positively identified  
 22 as M4.

23 **9:34 PM:** Captures video of white male in same position as previous video and  
 24 appears to be a continuation of the previous video showing the male masturbating.  
 25 The male's face is visible during the video, and he has been positively identified  
 26 as M4.

27 12. Investigators also obtained a video shared by MCCULLOUGH in a  
 28 Snapchat group chat comprising juvenile members of the motocross team – including  
 juveniles from whom he had requested and received sexually explicit images/videos. In  
 the video, MCCULLOUGH appears to be filming himself holding a handgun up to the

1 camera. The handgun's slide is locked open. While looking at the camera,  
 2 MCCULLOUGH says, "So there's actually a fucking n\*\*\*\*r in the fucking group chat  
 3 who will blast your ass." MCCULLOUGH points the muzzle of the handgun to the  
 4 camera, drops the slide, then states, "Let's go, bitch." After the video concludes, a photo  
 5 of MCCULLOUGH is shown in which he is holding one handgun in each hand and  
 6 pointing them both at the camera. The date and context in which the photo and video  
 7 were shared in the Snapchat group chat has not yet been determined by investigators.

### 8 CONCLUSION

9 13. Based on the above facts, I respectfully submit that there is probable cause  
 10 to believe that BRYANT KEITH MCCULLOUGH committed the offense(s) charged in  
 11 this Complaint.

12 

13 \_\_\_\_\_  
 14 Isabelle J Ghini, Affiant  
 15 Special Agent, FBI

16  
 17 The above-name agent provided a sworn statement attesting to the truth of the  
 18 foregoing to me this 10th day of April, 2023.

19 

20 \_\_\_\_\_  
 21 THERESA L. FRICKE  
 22 United States Magistrate Judge  
 23  
 24  
 25  
 26  
 27  
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